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January 3, 2003

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E., Suite 110
Washington, D.C. 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: In re Applications of **WorldCom, Inc.** and Its Subsidiaries
For Consent to Assign Commission Licenses'
Petition for Partial Reconsideration and Clarification

Dear Ms. Dortch:

Transmitted herewith on behalf of the **Office** of Communication of the United **Church** of Christ, Inc. is **an** original and four (4) copies of its petition for Partial Reconsideration and Clarification pursuant to **47 C.F.R. §1.106**.

Should any questions arise concerning this matter, please contact the **undersigned** directly.

Sincerely,



Gregg P. Skall
Counsel for the Office of communication
of the United Church of Christ

¹ The following applications are the subject of **this** petition: 0000995974; 0000996769; 0000998447; 0000999015; 0000999049; 0000999137; 0000999185; 0000999425; 0001001637; 0001001655; 0001001683; **BALMD-20020820AAA**; **BALMD-20020820AAB**; **BALMD-20020820AAC**; **BALMD-20020820AAD**; and **BALMD-20020820AAE**.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

_____)
In re Applications of)

WORLDCOM, INC., and its Subsidiaries)
Assignor)

AND)

WORLDCOM, INC., and its Subsidiaries)
as DEBTOR IN POSSESSION)
Assignee)

For Consent to Assign Commission Licenses _____) Nos. '

To: Chief, Wireless Telecommunications Bureau

Petition for Partial Reconsideration and Clarification

The Office of Communication of the United Church of Christ, Inc. ("UCC"), by its attorneys **and pursuant** to 47 C.F.R. §1.106, hereby requests the **Federal** Communications Commission ("FCC" or "Commission") to reconsider and clarify, in a supplemental order, that the Commission will address **the** disqualifying character issues **raised** against WorldCom **and** determine whether WorldCom is fit to **remain** a Commission licensee at the next procedurally available opportunity on which it **has** a non-ministerial application before it to which WorldCom, Inc. and its subsidiaries (together "WorldCom") is a party. In support thereof, the following **is** respectfully submitted:

¹ The following applications are **the** subject **of** this petition: 0000995974; 0000996769; 0000998447; 0000999015; 0000999049; 0000999137; 0000999185; 0000999425; 0001001637; 0001001655; 0001001683; BALMD-20020820AAA; BALMD-20020820AAB; BALMD-20020820AAC; BALMD-20020820AAD; and BALMD-20020820AAE.

WorldCom's corporate fraud clearly demonstrates that WorldCom lacks sufficient character qualifications to remain a licensee of the Commission. Because of UCC's commitment to advocate on behalf of the public interest in the area of communications and its conviction that WorldCom is unfit to hold licenses and authorizations issued by the Commission, UCC filed an informal objection ("Informal Objection") against the Commission's grant of the applications for assignment of the licenses held by WorldCom to WorldCom as the debtors-in-possession ("WorldCom-DIP").

UCC's Informal Objection, which was filed on October 15, 2002, detailed the enormity of WorldCom's fraud upon the public and requested that the Commission deny WorldCom's assignment applications because WorldCom lacked sufficient character to hold licenses and authorizations issued by the FCC, among other things. By a public notice released on December 5, 2002, the Wireless Telecommunications Bureau granted WorldCom's assignment applications. The Wireless Telecommunications Bureau also denied UCC's Informal Objection stating that WorldCom's assignment applications, which sought to assign the licenses held by WorldCom to WorldCom-DIP "results merely in a change in the status in which the licensee holds its licenses – from WorldCom to WorldCom as Debtor-in-Possession." See FCC Public Notice "Wireless Telecommunications Bureau Grants Applications for Assignment of Licenses to WorldCom, Inc. and Its Subsidiaries as Debtors In Possession," DA 02-3350, released December 5, 2002. However, the Wireless Telecommunications Bureau did not rule on the merits of UCC's Informal Objection because WorldCom's assignment application were regarded as ministerial, and thus the Informal Objection did not present the Commission an appropriate procedural context in which to review the potentially disqualifying character issues.²

² In its public notice, the Wireless Telecommunications Bureau stated that its denial of the Informal Objection is "without prejudice to UCC's right to raise its objections in a more appropriate procedural context." *Id.*


According *to* long standing Commission policy, disqualifying allegations such as those raised by UCC against WorldCom, however, do not simply vanish. In cases where the Commission does not reach the merits of a potentially disqualifying issue because the underlying application is dismissed, the Commission considers the allegations at the next appropriate opportunity (e.g., in connection **with** a subsequent application). *See e.g., Allegan County Broadcasters, Inc.*, Memorandum Opinion and Order, **83** FCC 2d 371, at para. **6** (1980); *Inquiry into Alleged Abuses of the Commission's Processes by Applicants for Broadcast Facilities*, Order, **4** FCC Rcd 6342 (1989); *Trinity Broadcasting of Florida, Inc.*, Hearing Designation Order, **8** FCC Rcd 2475, at **para. 5** (1993)(subsequent history omitted). Accordingly, before **the** Commission takes action on any future non-ministerial application or request for authorization filed by WorldCom, the Commission must deal **with** the disqualifying character issues raised against WorldCom, and at the next procedurally available **opportunity**, determine whether WorldCom is fit to remain a Commission licensee.

Respectfully submitted,

**OFFICE OF COMMUNICATION OF THE
UNITED CHURCH OF CHRIST, INC.**

January 3, 2003

By: _____


Gregg P. Skall
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202/857-4400
Its Attorneys

CERTIFICATE OF SERVICE

I, Dina Etemadi, a secretary at the law ~~firm~~ of Womble Carlyle Sandridge & Rice, PLLC, do hereby certify that true copies of the foregoing "Petition for Partial Reconsideration and Clarification" were mailed, postage prepaid on this 3rd day of **January, 2003**, to the following:

Intermedia Services LLC
8003 Westpark Drive, 2nd Floor
McLean, **VA 22102**
Attn: Mary O'Connor

CS Wireless Systems
8003 Westpark Drive, 2nd Floor
McLean, **VA 22102**
Attn: Mary O'Connor

WorldCom Broadband Solutions, Inc.
8003 Westpark Drive, 2nd Floor
McLean, **VA 22102**
Attn: *Mary* O'Connor

MCI WorldCom Network Services, Inc.
2270 Lakeside Blvd. **42955/B82**
Richardson, **TX 75082**
Attn: Laura J. Birkelbach

Intermedia Communications Inc.
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Intermedia Services LLC
3625 Queen **Palm** Drive
Tampa, FL **33619**

Intermedia Services LLC
2270 Lakeside Blvd. **42955/B82**
Richardson, **TX 75082**
Attn: Laura J. Birkelbach

Express Communications, Inc.
2210 Lakeside Blvd. **42955/B82**
Richardson, **TX 75082**
Attn: **Laura** J. Birkelbach

SkyTel Corp.
515 E. Amite Street
Jackson, MS 39201
Attn: Bruce Deer

SkyTel Communications, Inc.
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Dina Etemadi